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*Counsel for Evgeny A. Freidman, et al.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF SUBSTITUTION OF COUNSEL ON BEHALF OF  
EVGENY A. FREIDMAN AND PLAINTIFFS IN THE ACTION ENTITLED *FREIDMAN  
V. GENERAL MOTORS CORP., ET AL.*, S.D.N.Y. DOCKET NO. 08 CIV. 2458 (SAS)**

PLEASE TAKE NOTICE THAT Charles E. Dorkey III, Esq. of the law firm of McKenna Long & Aldridge LLP, 230 Park Avenue, Suite 1700, New York, New York 10169 shall be substituted in place of William R. Fried, Esq. and the law firm of Herrick, Feinstein LLP as counsel of record for Evgeny A. Freidman and the plaintiffs in the action entitled *Freidman v. General Motors Corp., et al.*, S.D.N.Y. Docket No. 08 Civ. 2458 (SAS) (collectively with Evgeny A. Freidman, "Freidman") in the above referenced bankruptcy matter and that all future pleadings and other papers should be served upon Charles E. Dorkey III, Esq. at the address indicated below.

PLEASE TAKE FURTHER NOTICE that this Notice of Substitution of Counsel shall not waive: (1) Freidman's right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (2) Friedman's right to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding relating to this case; (3) Friedman's right to

have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Respectfully submitted this 20<sup>th</sup> day of October, 2009.

HERRICK, FEINSTEIN LLP

By: 

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*Withdrawing counsel for Evgeny A. Freidman  
and plaintiffs in the action entitled Freidman v.  
General Motors Corp., et al., S.D.N.Y. Docket  
No. 08 Civ. 2458 (SAS)*

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*Superseding counsel for Evgeny A. Freidman  
and plaintiffs in the action entitled Freidman v.  
General Motors Corp., et al., S.D.N.Y. Docket  
No. 08 Civ. 2458 (SAS)*